Public Comment Todd Graham, Principal Forecaster and Researcher Metropolitan Council

Subject: RE: 2021 NAC Fall Virtual Meeting Public Comment

Dr. Tucker, Mr. Saenz, and Ms. Banks--

The National Advisory Committee to the Census will meet next week, November 4-5. I see the agenda includes discussions of 2020 Census results. I hope the NAC will ask the Census Bureau how instrument effect and recoding have impacted 2020 population counts by race and ethnicity. You are welcome to consider and ask the questions below in whatever way the NAC considers appropriate.

For the public comment opportunity at your meeting, I provide the following comment and questions:

Census Bureau executives and staff have previously discussed that the 2020 Census questionnaire was designed to elicit more information on ancestry and national origins, compared to previous censuses. This instrument redesign could have influenced respondents to indicate second or multiple races – even if the respondents do not typically self-identify as multi-racial.

Further, a blog post by Rachel Marks, et al, on August 3, 2021, describes that 2020 Census processing included an extensive race recoding operation (https://www.census.gov/newsroom/blogs/random-samplings/2021/08/improvements-to-2020-census-race-hispanic-origin-question-designs.html). Census Bureau checked and sometimes recoded major race categories in situations where respondents' lists of ancestries and national origins included response entries considered by Census as categorically belonging to different major race groups. Again, this may boost multi-racial population numbers by recategorizing persons who do not typically self-identify as having second or multiple races.

Taking these points together, I am concerned that Census Bureau's process "improvement" may be diminishing the concept of self-identified race -- that is, how people describe themselves. This shift in race concept could complicate post-2020 demographic analysis as Census's population counts by race will no longer fully align with historical time-series, nor with vital statistics from state health departments (for example: births and fertility rates by race of mother).

I would like for the Census Bureau to publicly provide more information on the instrument effect and the extent of recoding:

- 1. Can the instrument effect be quantified? For example, what share of people indicated additional races compared to their past answers in past surveys or the 2010 Census?
- 2. What number of records (persons) were recoded or "imputed" to have a second or multiple race? Census Bureau's blog post states that there was a race recoding operation; the blog post does not disclose the number of records (persons) recoded through this process "improvement."

Thank you for your attention to this issue. I greatly appreciate the NAC and Census Bureau's ambition of data products and research that accurately measure and represent the American population.

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Regards, Todd Graham



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